

MR 286478

May 19, 2005

American  
Chemistry  
Council

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VIA CERTIFIED MAIL

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U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460-0001



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ATTN: Toxic Substances Control Act (TSCA) Section 8(e) Coordinator

Re: Follow-up Report Information Acquired Concerning Ongoing Survival and Reproductive Toxicity Study of the Earthworm with Tetrabromobisphenol A (TBPPA), CAS No.: 79-94-7.

Dear TSCA 8(e) Coordinator:

The American Chemistry Council's Brominated Flame Retardants Industry Panel (BFRIP)<sup>1</sup> is submitting on behalf of its members this letter reflecting preliminary information from an un-audited draft study report, pursuant to the requirements of Section 8(e) of the Toxic Substances Control Act (TSCA). While the information is submitted in accordance with relevant Section 8(e) guidance promulgated by the U.S. EPA, BFRIP has made no determination as to whether a substantial risk of injury to the health or the environment is actually presented by the information. This preliminary information is from a repeated study and is being submitted as a follow-up to an earlier notification submitted by BFRIP on 04 March 2003 that included the study report of the previous study. The previous submittal was assigned Document Control Number 88-030000092. The results of the previous study reflected a no observed effect concentration (NOEC) of 4840 mg/kg dry soil for survival and a NOEC of 2.11 mg/kg dry soil for reproduction. The preliminary information from the un-audited draft report of the repeated study reflects a change regarding the NOEC for reproduction. When the final report is prepared and issued, the NOEC is likely to be 0.31 mg/kg dry soil.

If you have any questions, please feel free to contact me at (703) 741-5605.

Sincerely yours,

*Nancy Sandrof*

Nancy Sandrof, M.P.H.  
Manager, BFRIP  
American Chemistry Council

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<sup>1</sup> The members of BFRIP include Albemarle Corporation, Ameribrom, Inc. – ICL Industrial Products, and Great Lakes Chemical Corporation



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